

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

(Court Level and Jurisdiction)

Alexandria

Washington Randull K. Jr.

Plaintiff

-vs-

Stafford County Sheriffs Office (Public  
Information Officer)

Defendant

1:24-CV-578  
(Case I.D. Number)

**AFFIDAVIT**

I, Washington, Randull K. Jr., of Stafford, in Stafford County, Virginia, MAKE OATH AND SAY THAT:

1. COMPLAINT

The Plaintiff, Washington, Randull K. Jr., alleges as follows:

I. INTRODUCTION

1. This civil action is brought under 42 U.S.C. § 1983 by the Plaintiff, Washington, Randull K. Jr., alleging deprivation of constitutional rights under the Sixth Amendment and Article 11 of the Universal Declaration of Human Rights due to prejudicial public statements by the Stafford County Sheriff's Office, through Mr. Wilbur.

## II. JURISDICTION AND VENUE

2. Jurisdiction is under 28 U.S.C. §§ 1331, 1343; venue is proper under 28 U.S.C. § 1391, as events occurred within Stafford County, Virginia.

## III. PARTIES

3. Plaintiff, Washington, Randull K. Jr., resides in Stafford County, Virginia.

4. Defendant is the Stafford County Sheriff's Office in Stafford County, Virginia.

## IV. FACTUAL ALLEGATIONS

5. The Defendant, through Mr. Wilbur, released prejudicial statements on January <sup>3rd</sup>~~2~~, 2024, about the Plaintiff without acknowledging the Plaintiff's lack of a statement at the scene, biasing public perception and jeopardizing a fair trial.

6. These statements were made public during the discovery phase, undermining judicial process integrity.

## V. LEGAL OBLIGATIONS AND BREACH

7. The Plaintiff was entitled to a presumption of innocence and a fair trial under the Sixth Amendment and Article 11. The Defendant's actions violated these rights.

8. Disseminating prejudicial information constituted a breach of the Plaintiff's rights, affecting trial fairness and outcome.

## VI. DAMAGES

9. Resulting from the Defendant's actions, the Plaintiff suffered:

### A. Physical and Emotional Injuries

1. Headaches and Migraines: Induced by stress from prejudicial statements.

2. Digestive Issues: Caused by anxiety from public perception.

3. Heart Palpitations: Symptomatic of stress and anxiety.
4. High Blood Pressure: Resulting from stress.
5. Muscle Tension and Pain: Exacerbated by stress.
6. Fatigue and Sleep Disturbances: Affecting well-being.
7. Weight Fluctuations: Due to emotional toll.
8. Immune System Suppression: From stress.
9. Respiratory Issues: Stress-related.
10. Skin Reactions: Including rashes from stress.

#### B. Mental and Psychological Injuries

1. Anxiety and Panic: From public and juror perceptions.
2. Depression: Due to prejudicial statements.
3. Overwhelm: By the situation's stress.
4. Obsessive Thoughts: About case and perception.
5. Guilt and Shame: From public judgment.
6. Loneliness and Isolation: Due to public stance.
7. Irritability and Anger: From stress.
8. Hopelessness and Despair: About future and outcome.
9. Intrusive Memories: Of the incident.

10. Difficulty Concentrating: From stress.

## VII. PRAYER FOR RELIEF

The Plaintiff requests compensatory and punitive damages of \$500 million and further relief, including injunctions against prejudicial information dissemination.

## VIII. ANTICIPATION OF DEFENSES AND REBUTTAL

10. The Plaintiff addresses potential defenses:

a. Public Duty and Free Speech: These do not justify infringing upon fair trial rights. The duty to inform cannot override constitutional guarantees.

b. Lack of Prejudice or Harm: The immediate extensive damages demonstrate the harm caused.

c. Immunity or First Amendment Protection: These defenses are invalid against evidence of constitutional violations impacting Sixth Amendment rights.

d. Absence of Intent: Foreseeable negative impacts render intent irrelevant, showing disregard for constitutional rights.

## IX. CONCLUSION AND REAFFIRMATION OF CLAIMS

The comprehensive case laid forth preempts defenses, underscoring the clear violation of rights and the extensive damages suffered.

## VII. PRAYER FOR RELIEF (continued)

c. Invalidate defenses justifying or minimizing the Defendant's harmful actions, affirming the Plaintiff's right to relief.

COMMONWEALTH OF VIRGINIA

COUNTY OF STAFFORD

City of Alexandria

SUBSCRIBED AND SWORN TO BEFORE

ME, on the 10<sup>th</sup> day of  
April, 2024

Signature

Michael Vincent Sibly (Seal)

NOTARY PUBLIC

My Commission expires:

March 31, 2027

Randall K. Washington Jr.  
(Signature)

Washington, Randall K. Jr.

